

EXHIBIT F

**FEDERAL COMMUNICATIONS COMMISSION**

WASHINGTON, D.C. 20534

IN REPLY REFER TO:

8910-LAM

Robert B. Jacobi, Esquire  
Cohn and Marks  
1333 New Hampshire Avenue, N.W.  
Washington, DC 20036

In re: Mount Wilson FM Broadcasters, Inc.  
Application for Major Modification  
KULA, Maunawili, HI  
BMP-870325AF

Dear Mr. Jacobi:

This is in reference to the above-captioned application of Mount Wilson FM Broadcasters, Inc. ("Mount Wilson"), to change the community of license for KULA(AM) from Maunawili, Hawaii, to Honolulu, Hawaii.

The Commission has held that Section 307(b) of the Communications Act of 1934, as amended,<sup>1</sup> is a relevant factor in applications for a change in community of license. In Ark-Valley Broadcasting Company, Inc., 15 FCC 818, 821 (1951), the Commission stated: "[w]e adhere to the theory ... that Section 307(b) is applicable to applications for removal of stations from one community to another." Thus, your proposal to change community of license must be examined for compliance with the provisions of Section 307(b).

Our records indicate that KULA is the only radio station authorized to the community of Maunawili, while Honolulu has numerous radio stations authorized to it. Accordingly, your proposal appears on its face to be inconsistent with Section 307(b). However, your application does not address the Section 307(b) aspects of your proposed change in community of license. Because you have not addressed the Section 307(b) issue, we do not have sufficient information to determine whether the grant of your

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<sup>1</sup> 47 U.S.C. Section 307(b) provides that: "In considering applications for licenses, and modifications and renewals thereof, when and insofar as there is demand for the same, the Commission shall make such distribution of licenses, frequencies, hours of operation, and of power among the several states and communities as to provide a fair, efficient, and equitable distribution of radio service to each of the same."

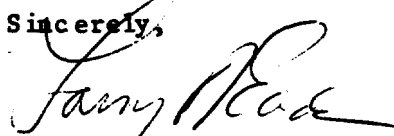
Robert B. Jacobi, Esquire

application would be in the public interest. Accordingly, we will afford you an opportunity to show that your proposed change in community of license would be consistent with Section 307(b).

In making your showing, the traditional Section 307(b) factors should be addressed including information about the need for reception and transmission services in the respective communities. Kent-Ravenna Broadcasting Co., 22 RR 2d 605,611 (1961). In addition, the availability of other channels or frequencies for use in the community losing service may be relevant. See Waterman Broadcasting Corp. et al., 10 FCC 2d 712 (1967). Moreover, you should address any factors which may mitigate the significance of any potential adverse impact under Section 307(b). See Seggi Broadcasting Corporation, (Mimeo No. 3677, MMB, released April 18, 1984) and Letter to Baraket Saleh re WVIS-FM, Frederiksted, St Croix (Audio Services Division, July 20, 1984). You may also include any other factors relevant to the Section 307(b) determination.

In view of the foregoing, pursuant to Section 73.3514(b) of the Commission's Rules, Mount Wilson is hereby requested to provide a written showing within 30 days demonstrating why the grant of its application to change community of license would be consistent with Section 307(b) of the Communications Act of 1934, as amended. Failure to comply with this request may result in the dismissal of this application pursuant to Section 1.748(a) of the Commission's Rules.

Sincerely,



Larry D. Eads, Chief  
Audio Services Division  
Mass Media Bureau